

Page 170

1 A. Sometimes.

2 Q. I guess I'll ask it a different way. To
3 your knowledge, would the person making the
4 assignments make assignments of certain projects to
5 you because you were more proficient on the
6 computer?

7 A. Yes.

8 Q. Do you think you got a higher level of work
9 than others who were working in that area?

10 A. If they needed it faster, they did.

11 Q. Otherwise it was trial and error for the
12 other folks?

13 A. Yeah.

14 Q. Did that method of assignment of work, did
15 that change at all before the time you left the
16 company?

17 A. It was always changing. It did change quite
18 a bit.

19 Q. But is it fair to say that assignments were
20 always made by department supervision or management?

21 A. Yes.

22 Q. Is it also fair to say that you got a
23 substantial number of projects that required more
24 advanced use of the computer?

Page 171

1 A. At times I would believe so.

2 Q. Could you do things in terms of putting
3 together, finishing projects that others in the
4 department could not do?

5 A. Sometimes if there was a stumbling block,
6 yes, I would finish it.

7 Q. Did that continue throughout the time you
8 worked in the department?

9 A. Yes.

10 Q. Did you attend any training programs at all
11 at Bull?

12 A. At Bull?

13 Q. Yes.

14 A. No.

15 Q. Any training programs elsewhere?

16 A. Computer training programs?

17 Q. Let me ask that first, computer training.

18 A. No.

19 Q. Any other types of training?

20 A. Just as I had mentioned, my watercolor
21 classes.

22 Q. That's the DeCordova?

23 A. Yeah.

24 Q. The work that Gavin Studio did for other

Page 172

1 entities, entities unrelated to Bull, was any of
2 that work done on the Bull premises?

3 A. Yes.

4 Q. How often did that occur?

5 A. It would happen times when at night, instead
6 of just rushing home, I would just turn over and
7 just do some other work.

8 Q. Did you request anyone's approval to do
9 that?

10 A. It was full knowledge that I was there doing
11 it, after hours.

12 Q. Who had this knowledge?

13 A. Peter Stravropoulos.

14 Q. Did you --

15 A. And Ted Lavash would know.

16 Q. To your knowledge, was anyone else, any of
17 the other people doing graphic arts work, were they
18 doing non-Bull work on Bull premises?

19 A. I don't believe they were seeking any other
20 work.

21 Q. Did you ever do work for non-Bull clients
22 between the hours of nine and five?

23 A. Only at lunch hour I might do a little bit.

24 Q. Would that be work that you would do on

Page 173

1 behalf of Gavin Studio, correct?

2 A. Correct.

3 Q. Other than the invoices that Gavin Studio
4 submitted to Bull, did you submit any other records
5 of the time you spent on projects?

6 A. I'm not sure what you mean by that.

7 Q. Did you submit time sheets or anything like
8 that?

9 A. Oh, yes.

10 Q. How often?

11 A. That changed over the years, also.

12 Q. What type of time sheets did you submit?

13 A. Well, when we were in Waltham, John Haskell,
14 we had all the product briefs and that time of work,
15 we had a time sheet for a week. And you'd list
16 every job number -- every job was assigned a number
17 when it came in. You would log the number of the
18 job, the job number, the day and the hours you
19 worked on that job. And at the end, it would be
20 tallied up on a computer and billed back to the
21 department.

22 Q. Would that just show the total number of
23 hours you spent on the projects or would it actually
24 show the hours you were --

Page 174

1 A. It would show the whole week's worth of your
 2 time, show everything you did that you billed
 3 against for that week.
 4 Q. But would it show the specific time?
 5 A. You mean the time of day?
 6 Q. Yes.
 7 A. No. Well -- no, it would just tally up. If
 8 you had eight hours, it was broken down for the
 9 jobs. You would assign time for every job so it had
 10 added up to eight hours.
 11 Q. It would say three hours on this job, two
 12 hours on this job? It wouldn't say exactly what
 13 time you did the work?
 14 A. It wouldn't say what time during the day,
 15 because you might split it up during the day.
 16 Q. Did you punch a time clock or anything like
 17 that?
 18 A. They didn't have any time clocks.
 19 Q. Do you know how the graphic artists that
 20 were employees, do you know how their time was
 21 recorded?
 22 A. Same way.
 23 Q. Were they paid on an hourly basis or salary
 24 basis?

Page 175

1 A. Most of them were hourly basis, I believe.
 2 Q. Do you know how the company determined how
 3 many hours to pay for them?
 4 A. By the hours they worked, I assume.
 5 Q. How did they know the hours they worked?
 6 A. By their time -- oh, they had their own
 7 forms for payroll, which they would submit. It was
 8 a payroll stub telling what they worked. It would
 9 have to be signed by the department head to be
 10 approved and go to payroll. I'm assuming this is
 11 how it worked. Then they would get paid.
 12 Q. And you didn't fill out a form like that,
 13 correct?
 14 A. I did not.
 15 Q. Is it true that the other contractors also
 16 did not fill out forms like that?
 17 A. True.
 18 Q. I'm going to show you a few more documents
 19 in fairly rapid succession. Many of these are
 20 documents I believe that you produced.
 21 (Exhibit 12 marked for identification)
 22 (Document exhibited to witness)
 23 Q. Mr. Gavin, you have been presented with
 24 Exhibit 12, which is a photograph, have you seen

Page 176

1 that before?
 2 A. Yes, I have.
 3 Q. Are you in this photograph?
 4 A. Yes, I am.
 5 Q. There's an arrow pointing to somebody. Is
 6 that you?
 7 A. Unfortunately, yes.
 8 Q. When did you first see this photograph?
 9 A. Shortly after it was taken. I don't know
 10 what date.
 11 Q. What is it a photograph of, if you know?
 12 A. It's a photograph of the graphic arts
 13 department and some of the typesetters, typesetting
 14 department.
 15 Q. Do you recall when this was taken?
 16 A. No, I don't. It was in Waltham, though.
 17 Q. Okay. So it was before the move to
 18 Billerica?
 19 A. Yes.
 20 Q. Now, who was the department supervisor at
 21 that time?
 22 A. John Haskell.
 23 Q. Is he in this picture?
 24 A. He is.

Page 177

1 Q. Where is he?
 2 A. He's in the middle with the striped tie and
 3 glasses.
 4 Q. Okay. Sort of --
 5 A. Right here.
 6 Q. Oh, okay. How many other -- is there
 7 anybody in that picture who was a graphic artist at
 8 that time?
 9 A. Yes.
 10 Q. How many graphic artists are in here?
 11 A. Five counting me. Six -- wait a minute.
 12 Q. Are you counting Mr. Haskell?
 13 A. Yes. One, two, three, four, five, six,
 14 seven.
 15 Q. Are the rest typesetters?
 16 A. Typesetters and writers and proof readers.
 17 And I'm not sure who the man on the left is or the
 18 man on the top with the smile.
 19 Q. Is it fair to say that if you don't
 20 recognize people, they weren't graphic artists?
 21 A. That's true.
 22 Q. Do you know why this picture was taken?
 23 A. The lady in the front there with the glasses
 24 was I believe the VP, vice president of, I'm not

45 (Pages 174 to 177)